

From: [Turner, Philip](#)
To: [Berg, Marlene](#)
Cc: [Poore, Christine](#); [Miller, Garyg](#)
Subject: RE: San Jacinto Waste Pits - info on TDI approach and RBA
Date: Thursday, June 06, 2013 2:21:10 PM

Thanks, Marlene! Yep... I'm on Furlough tomorrow too.

From: Berg, Marlene
Sent: Thursday, June 06, 2013 2:12 PM
To: Turner, Philip
Cc: Poore, Christine; Miller, Garyg
Subject: RE: San Jacinto Waste Pits - info on TDI approach and RBA

Phil,
Thanks for sending this to me. I had planned to work on this today but am tied up.
I'll be on furlough tomorrow, but will get back to it early next week.
Marlene

From: Turner, Philip
Sent: Wednesday, June 05, 2013 4:18 PM
To: Berg, Marlene
Cc: Poore, Christine; Miller, Garyg
Subject: San Jacinto Waste Pits - info on TDI approach and RBA

Hi Marlene,

Thanks for chatting with us Monday! Attached you will find an Exposure Assessment Memo, and Toxicological & Epidemiological Studies Memo (TES), and portions of the HHRA for the San Jacinto site (Section 5.1.2.2.2 and Table 5-26). Only extractions from the HHRA because it is 28 Mb file.

Justification/explanation for use of the WHO TDI approach can be found in the TES memo, section 4.1.3, Toxicological Criteria for TCDD, beginning on page 4-7. Specific reference to the Cal EPA CSF can be found on page 4-9. Specific discussion of the WHO TDI can be found on page 4-12. This entire section encompasses cancer assessment (or TDI in lieu of traditional cancer assessment). Table 5-26 of the HHRA also provides a historical comparison of risk-based doses & threshold doses for cancer assessment. The bulk of the argument stems from the notion of non-linear toxicity. Although EPA has not formally adopted that approach yet, it seems inevitable that we will.

Discussion of their RBA can be found in the Exposure Assessment Memo, Section 4.3.1, beginning page 4-24. An enhanced discussion of the RBA can be found in the HHRA, Section 5.1.2.2.2.

The PRPs were curious about the Dow study you mentioned. They are aware of one, and were wondering if there is another more recent study. Could you please give me a little more detail on that study, or point me to a reference?



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Thanks for all your help!!

Phil

Philip K. Turner, PhD
Env Scientist / Risk Assessor
US EPA
1445 Ross Ave. Suite 1200
Dallas, TX 75202
Tel: (214) 665-2706
Fax: (214) 665-6660
turner.philip@epa.gov